

Deficiency Status Report 1

Status Report Submitted: 11-30-2007

CUPA Name: Glenn County Air Pollution Control District

Evaluation Date: September 26 and 27, 2007

Next Status Report Due: December 26, 2007

State Evaluation Team:

Cal/EPA Team Leader: Kareem Taylor

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Based on the CUPA's corrective action responses, the following deficiencies are considered corrected and no further updates are required:
N/A

Please update the deficiencies below that remain in progress.

Deficiencies and Corrective Actions

1. **Deficiency:** The CUPA did not report all of its regulated facilities on the Annual Single Fee (Report 2) and Annual Inspection (Report 3) Summary Reports for fiscal year (FY) 06/07.

Specifically, the CUPA did not report all of its agricultural handlers regulated under the business plan program.

Preliminary Corrective Actions: By December 27, 2007, revise the CUPA's FY 06/07 Annual Summary Reports 2 and 3 to include all the agricultural handlers regulated by the CUPA.

Submit revision to Cal/EPA along with the CUPA's first status report.

CUPA's 1st Status Update: Our agricultural handlers were hand counted to find a total of 458 regulated under the business plan program. This information along with the number of Ag facilities inspected and the fees collected were added to Reports 2 and 3. The Agricultural handlers will be added to a separate CUPA-DMS database for easier tracking and recordkeeping.

2. **Deficiency:** The CUPA's Inspection and Enforcement Plan is missing an enforcement notification procedure for appropriate confidentiality.

Preliminary Corrective Actions: By December 27, 2007, revise the CUPA's Inspection and Enforcement Plan to include an enforcement notification procedure for appropriate confidentiality.

Submit revision to Cal/EPA along with the CUPA's first status report.

CUPA's 1st Status Update: An enforcement notification procedure for appropriate confidentiality has been added to the Inspection and Enforcement Plan.

3. **Deficiency:** The CUPA has not met the mandated inspection frequency for the HMRRP program.

Preliminary Corrective Actions: By September 27, 2009, and annually thereafter, the CUPA will inspect at least one third (33% per year) of its HMRRP facilities, including agricultural handlers.

By March 27, 2008, the CUPA must develop a plan to insure that each HMRRP facility, including agricultural handlers, is inspected once every three years.

CUPA's 1st Status Update: An additional part time inspector is being considered and the agricultural biologists will increase their inspections to help increase our inspection totals. An exemption for certain agricultural handlers with limited storage is also being formulated.

4. **Deficiency:** The CUPA is not collecting enough revenue to cover the cost of implementing Glenn's Unified Program.

Preliminary Corrective Actions: By July 27, 2008, submit a FY 07/08 revenue/expenditures report to Cal/EPA.

This deficiency will be considered corrected if the total revenue equals at least 90% of the total CUPA expenses.

CUPA's 1st Status Update: Our fee schedule is currently under revision and will go to the board early next year after we hold a public comment period.

5. **Deficiency:** The CUPA is not collecting the state surcharge along with its local fees from agricultural handlers.

Preliminary Corrective Actions: By October 27, 2007, the CUPA must begin collecting the state surcharge as part of its single fee from agricultural handlers. The state surcharge should be collected annually.

CUPA's 1st Status Update: All agricultural handlers will now be billed annually and a state surcharge will be collected.

6. **Deficiency:** The CUPA has not met the requirement of obtaining inventories or inventory certifications from each business plan facility on an annual basis. Specifically, inventories from agricultural handlers are obtained at the time of inspection (once every three years).

Preliminary Corrective Actions: By September 27, 2008, the CUPA should collect inventories or inventory certifications from all business plan facilities, including agricultural handlers, annually.

By March 27, 2008, the CUPA must develop a plan to insure that inventories or inventory certifications are received annually from all business plan participants.

CUPA's 1st Status Update: The agricultural handlers are going to be added to their own CUPA DMS database and will be billed annually and be required to submit an inventory certification annually.

7. **Deficiency:** The CUPA does not have a CalARP dispute resolution procedure.

Preliminary Corrective Actions: By November 27, 2007, the CUPA must develop a dispute resolution procedure that addresses all of the elements of Title 19 section 2780.1.

CUPA's 1st Status Update: A dispute resolution procedure is now in place for CalARP facilities.

8. **Deficiency:** The CUPA has not been conducting an annual CalARP performance audit.

Preliminary Corrective Actions: By November 27, 2007, and annually thereafter, the CUPA must perform a CalARP performance audit. This information may be included with the annual Title 27 self-audit.

CUPA's 1st Status Update: A CalARP performance audit was performed for the Fiscal Year 2006-2007 and integrated into our annual Program Evaluation.

9. **Deficiency:** The UST Permit to Operate generated by the CUPA's DMS shows monitoring requirements for the tanks, but does not show the monitoring requirements for the piping.

Preliminary Corrective Actions: By December 27, 2007, add the monitoring requirements used for the piping to the Permit to Operate, including UDC monitoring, leak detectors, etc.

CUPA's 1st Status Update: The CUPA-DMS program is currently being updated to include the piping monitoring on the Permit-to-Operate and will be available soon.

10. **Deficiency:** Some of the plot plans reviewed did not show the monitoring locations of the tanks, piping, etc.

Preliminary Corrective Actions: During the UST inspections, update the facility map/plot plan that shows the monitoring locations of the tank system.

By December 27, 2007, submit two facility map/plot plans to Cal/EPA that contain monitoring locations of the tank system.

CUPA's 1st Status Update: Facility maps are now being updated, if necessary, during annual inspections. 2 maps are included 1 drawn at an inspection and 1 submitted by a Designated Operator of a Facility that had a change of ownership.